

## **Summary of the Accrediting Authority Committee Meeting July 29, 1997**

The National Environmental Laboratory Accreditation Conference (NELAC) Accrediting Authority Committee met during the Third NELAC Annual Meeting at the Wyndham Anatole Hotel in Dallas, Texas on Tuesday, July 29, 1997 from 12:30 to 5:00 pm. The meeting was led by Committee Chair, Mr. John Anderson, Division Manager of the State of Illinois Environmental Protection Agency (IL-EPA). A list of action items is given in Attachment A. A list of Committee members is given in Attachment B. Meeting participants received copies of the chapter as changed by the Committee in response to deliberations at the Second NELAC Interim Meeting, the Agenda for this session, an errata sheet, comments by the EMMC Laboratory Accreditation Panel, and an overview of the present NELAP Standard.

### **Introduction**

Mr. Anderson asked that committee members introduce themselves. Special guests were recognized, including Ms. Carol Batterton, NELAC Chair-Elect and Mr. Joe Aiello, former chair of this Committee.

Mr Anderson noted that he will exercise the editorial privileges of the Chair for making grammatical corrections and clarifications as authorized in the NELAC Constitution.

The issue of institutional memory was discussed, especially in regard to building a record of the Committee's intent while crafting these standards. Mr. Anderson suggested that this is an issue to be forwarded to the NELAC Board.

### **Comments from the Department of Defense**

A set of comments on the NELAC Standards by the Department of Defense (DoD) was distributed at the outset of this session. These comments covered the NELAC Constitution, By-laws and all of the NELAC Standards, Chapters 1-6. The DoD's comments may have major issues that need resolution. Mr. Anderson requested that participants, including the Committee, thoughtfully consider these comments in time for discussion at the Third NELAC Interim Meeting scheduled for December, 1997. The Committee committed to begin discussion on these comments during its teleconference meetings this fall.

### **Overview of Chapter 6**

Mr. Anderson led the group through an overview of Chapter 6. He referred participants to the process flow diagram (Figure One) in the published version of Chapter 6.

### **Errata Sheet**

Mr. Anderson referred participants to the June 30, 1997, version of the Chapter, which all participants received in their registration packet. He indicated that he has received only a few comments on the present version of Chapter 6. The Committee's present recommendation for adoption of Chapter 6 consists of the Chapter as published in the registration packet and the associated errata sheet. He stated that any changes to Chapter 6 made by the Committee during its meeting on July 29, 1997, would be incorporated into the proposal to be presented during the

NELAC voting session set for July 31, 1997. The following actions were taken by the Committee for inclusion in the draft Chapter 6 to be presented on July 31, 1997:

The change in Section 6.2 (c) was discussed. Concern was expressed that the proposed change deleting the word “entire” would limit the flexibility of an accrediting authority to elect to contract for services beyond the assessment process. It was agreed to alter the wording to clarify the Committee’s intent: “Portions of the accreditation process may be contracted out ...” However, the Committee noted that the state, territorial or federal accrediting authority must not contract out the final decision of granting or not granting NELAP accreditation to a laboratory.

The change in Section 6.2 (d)(3) changing fee authorization from “... fees authorized by the NELAC ...” to “... fees authorized by territorial, state or federal law” was approved.

The addition of a subsection (f) to 6.2.2 “In order that all laboratory applications for NELAP accreditation are treated equally, accrediting authorities shall initiate processing applications for NELAP accreditation in the chronological order that the applications are received.” was approved.

The deletion of a section 6.3.1 (b)(11) was approved.

The change in 6.3.3.1 (h) adding the language to specify the expertise required of the individual responsible for management of a NELAP-recognized accrediting authority was discussed. For item 1), the term “full-time” was deleted, and in 2)C) “oversee” was replaced with “coordinate”

The addition in 6.3.3.1.3 (b) of item 7 to stipulate appropriate document control procedures was approved.

The proposal for deleting 6.8 (b)(3) that urged laboratory clients to check the accreditation status of the laboratory was discussed, and deleted as proposed.

The movement of the definition of NELAP recognition in 6.11 to the glossary was re-approved. Ms. Shields will assure that the glossary includes of the desired change.

The issues of consistency of the NELAC Standards with the relevant ISO Guides was discussed. This Committee will discuss this issue further in preparation for its work at the Third NELAC Interim Meeting. No action was taken at this time.

### **Response to Comments by EMMC Laboratory Accreditation Panel**

The EMMC recommended a change in the required time for accrediting authority record retention from ten years to five years for consistency with laboratory record retention requirements. It was noted that record retention by an accrediting authority for less than five years will not suffice for records of past audits of accrediting authorities being available for subsequent audits. Participants from several states voiced support for the ten year limit. The Committee will retain a ten year retention requirement for records required of NELAP-recognized accrediting authorities.

Section 6.9.1 was discussed. To clarify the date at which all territorial, state or federal NELAP assessment team members (other than the USEPA team member) must be appointed solely from

NELAP-recognized accrediting authorities, the phrase “NELAP is officially implemented” was deleted. That phrase was replaced with the phrase “first accrediting authority recognitions are announced.”

Section 6.9.1(f) relating to non-government personnel on the assessment team was discussed. The consensus on the Committee was to respect the position of EMMC, as well as the recommendation in yesterday’s ELAB meeting and delete 6.9.1(f). The EMMC communicated to this Committee its strong feeling that it is inappropriate to have non-governmental individuals on the assessment teams reviewing accrediting authorities.

### **Additional Issues For Subsequent Meetings**

Mr. Anderson asked Committee members and meeting participants to voice additional issues related to this chapter. These issues will be considered by this Committee in its preparation for its work at the Third NELAC Interim Meeting.

1. Conflict of Interest concerns (ELAB) regarding accreditation of laboratories in the same Agency as the accrediting authority.
2. Definition of secondary accrediting authority [Policy & Structure (1.6.2.3.2)]. It was noted that a conflict in definitions may exist between Chapters one and six.
3. Establishment of advisory committees, to include the client community, for secondary accrediting authorities [6.2(g)]. Suggested wording is: “secondary accrediting authorities are encouraged to form an advisory committee for the purpose of receiving advice relating to the overall operations of its accreditation program which shall include representatives from its client laboratories.”
4. Consistency with ISO Guide 58.
5. Ensure consistency of 6.2.2(d) with 6.2.2(b)
6. Change options to require state laboratories seeking NELAP recognition to go to the USEPA or other state NELAP-recognized accrediting authorities (like drinking water laboratories now) for accreditation [6.2.2(e)].
7. Consider the entire DoD comment package.
8. Consider Chapter 6 sections that set forth response time requirements during the application review process allowing 10-15 days to respond
9. In Section 6.3.3.1 - consider the selection of a nine-month total response time.
10. In Fig 1: “Only 1 appeal per application cycle...” should be reconciled with text.
11. Dual programs: On this issue, this committee is mute; however it is on the agenda for Transition Committee meeting on July 30, 1997.
12. May need to define “acceptance” of an application, which follows the “technical review” in Section 6.3.3.2(a).
13. Define registration as a “lead assessor.” 6.9.1(e)(A). This should be an entry in the glossary.
14. The issue of multiple accrediting authorities in the same state may need to be addressed. See Section 6.2.2(e).

### **Closing Discussion**

Mr. Anderson reviewed the process for voting on Thursday, July 31, 1997. So that all NELAC III participants can be fully aware of what they are being asked to vote on, a Committee report session is scheduled for Wednesday, July 30, 1997. At that time, the Chair will report on the Committee’s

actions taken at this meeting.

The Committee then discussed the best way to present the Chapter 6 Accrediting Authority Standards at the voting session. The Committee concurred in directing the Chair to present the Chapter in its entirety, rather than in sections. The Committee further directed the Chair to include in the package to be voted on at the July 31, 1997, meeting all of the substantive changes made at this meeting. In addition, the Chair is to include any editorial changes deemed necessary.

Mr. Anderson concluded the meeting by thanking participants for their contributions.

### **Next Meeting**

The next Committee meeting will be scheduled for mid-September to begin addressing the above issues and others that may be raised. The upcoming meetings will be in the form of teleconferences, and will be scheduled by the Chair.

**ACTION ITEMS**  
**Accrediting Authority Committee Teleconference**  
**July 29, 1997**

| <b>Item No.</b> | <b>Action</b>   | <b>Date Completed</b> |
|-----------------|---|-----------------------|
| 1               | Mr. Anderson will forward the issue of developing an institutional memory for NELAC to the NELAC Board.   |                       |
| 2               | This Committee will discuss the issue of consistency with the relevant ISO Guides in preparation for its work at the Third NELAC Interim Meeting. |                       |
| 3               | Ms. Aurora Shields will assure that Section 6.11 defining the term “NELAP Recognition” is moved to the glossary.                                  |                       |
| 4               | Mr. Anderson will ensure that all of the “additional issues” are placed on the Agenda for the teleconferences scheduled to start this fall.       |                       |
| 5               | Mr. Anderson will schedule additional meetings of the Committee starting in Mid-September, 1997.  |                       |

**LIST OF COMMITTEE MEMBERS/TELECONFERENCE PARTICIPANTS**  
**Accrediting Authority Committee Teleconference**  
**July 29, 1997**

| <b>Name</b>                         | <b>Affiliation</b>                        | <b>Phone/Fax/E-mail</b>  |
|-------------------------------------|---|--|
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